

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-2(c)	
Anthony Landolfi, Esquire 295 Bridgeton Pike P.O. Box 111 Mantua, New Jersey 08051 856-468-5900 Attorney for Debtor	
In Re:  ROBERT M.MORACE,  Debtor(s)	Case No.: 17-27250 Chapter: 13 Adv. No.: Hearing Date: July 26, 2022 Judge: Jerrold N. Poslusny

#### CERTIFICATION OF SERVICE

1. I, Kathleen Giovene :

represent the \_\_\_\_\_ in the above-captioned matter.

am the secretary/paralegal for Anthony Landolfi, Esq., who represents the  
Debtor in the above captioned matter.

am the \_\_\_\_\_ in the above case and am representing myself.

2. On June 30, 2022, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:

Notice of Motion to Vacate Dismissal and Reinstate Chapter 13 Case  
Certification in Support of Motion to Vacate Dismissal  
Proposed Order  
Application for Order Shortening Time

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated. #

Dated: June 30, 2022

/s/ Kathleen Giovene  
Signature

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Isabel C. Balboa Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38 - Suite 580 Cherry Hill, NJ 08002	Chapter 13 Trustee	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
The Honorable Jerrold N. Poslusny, Jr. United States Bankruptcy Court P.O. Box 2067 Camden, New Jersey 08101	Judge	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
U.S. Trustee U.S. Department of Justice Office of the US Trustee One Newark Center - Suite 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Robert P. Saltzman, Esquire Pluese Becker & Saltzman, LLC 20000 Horizon Way Suite 900 Mt. Laurel, NJ 08054	Attorney for Ditech Financial, LLC	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Ally Financial P.O. Box 130424 Roseville, MN 55113-0004	Creditor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Ally Financial c/o John R. Morton, Jr., Esq. Morton & Craig, LLC 110 Marter Ave. - Suite 301 Moorestown, NJ 08057	Attorney for Creditor, Ally Financial	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Atlantic City Electric 5 Collins Drive Suite 2133 Mail Stop 84CP42 Carneys Point, NJ 08069	Creditor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Capital One Bank (USA), N.A. P.O. Box 71083 Charlotte, NC 28272-1083	Creditor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Lakes at Bankbridge HOA c/o Pinnacle Realty Services 151 Fries Mill Road - Suite 502 Turnersville, NJ 08012	Creditor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Lakes at Bankbridge HOA c/o George C. Greatrex, Jr., Esquire Shivers, Gosnay & Greatrex, LLC 1415 Route 70 East - Suite 309 Cherry Hill, NJ 08034	Attorney for Creditor, Lakes at Bankbridge HOA	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Credit First, NA P.O. Box 818011 Cleveland, OH 44181	Creditor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
TD Bank USA, N.A. c/o Weinstein & Riley, PS 2001 Western Avenue Suite 400 Seattle, WA 98121	Creditor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)

\* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.

Name and Address of Party Served	Relationship of Party to Case	Mode of Service
Ditech Financial LLC P.O. Box 6154 Rapid City, SD 57709-6154	Creditor	Regular Mail
Ditech Financial, LLC c/o Denise Carlon, Esquire KML Law Group, P.C. 216 Haddon Avenue - Suite 406 Westmont, NJ 08108	Attorney for DiTech Financial, LLC	Regular Mail
Ditech Financial, LLC c/o Brian C. Nicholas, Esquire KML Law Group, P.C. 216 Haddon Avenue - Suite 406 Westmont, NJ 08108	Attorney for DiTech Financial, LLC	Regular Mail
Friedberg Eye Associates 661 N. Broad Street Woodbury, NJ 08096	Creditor	Regular Mail
Dawn Morace 413 Eryn Road Wenonah, NJ 08090	Wife of Debtor	Regular Mail
Liberty Mutual Attn: Credit Collection Services P.O. Box 55126 Boston, MA 02205	Creditor	Regular Mail
South Jersey Gas 142 South Main Street Hammonton, NJ 08037	Creditor	Regular Mail
Target P.O. Box 673 Minneapolis, MN 55440	Creditor	Regular Mail
Virtua Summit Surgical Attn: Apex Asset Mgmt., LLC P.O. Box 5407 Lancaster, PA 17606	Creditor	Regular Mail

<b>Name and Address of Party Served</b>	<b>Relationship of Party to Case</b>	<b>Mode of Service</b>
West Jersey Anesthesia Assoc. Attn: Capital Collection Services P.O. Box 150 West Berlin, NJ 08091	Creditor	Regular Mail

**File a Motion:**

**17-27250-JNP Robert M. Morace Debtor dismissed 05/05/2022**

Type: bk

Chapter: 13 v

Office: 1 (Camden)

Assets: y

Debtor disposition: Dismissed  
for failure to make plan  
payments

Judge: JNP

Case Flag: DISMISSED DebtEd  
SUPDIS CONFIRMED

**FILED**

JEANNE A. NAUGHTON, CLERK

**U.S. Bankruptcy Court**

**District of New Jersey**

**JUL - 5 2022**

  
U.S. BANKRUPTCY COURT  
CAMDEN, N.J. DEPUTY  
BY 

**Notice of Electronic Filing**

The following transaction was received from Anthony Landolfi entered on 6/30/2022 at 3:31 PM EDT and filed on 6/30/2022

**Case Name:** Robert M. Morace

**Case Number:** 17-27250-JNP

**Document Number:** 96

**Docket Text:**

Application to Shorten Time (related document:[95] Motion to Vacate Dismissal of Case filed by Debtor Robert M. Morace) Filed by Anthony Landolfi on behalf of Robert M. Morace. (Attachments: # (1) Proposed Order # (2) Certificate of Service) (Landolfi, Anthony)

The following document(s) are associated with this transaction:

**Document description:** Main Document

**Original filename:** Application for Order Shortenting Time - June 2022.pdf

**Electronic document Stamp:**

[STAMP bkecfStamp\_ID=1002741850 [Date=6/30/2022] [FileNumber=59890988-0] [1d05736ebef1fc41b673af330f34a28a01ffe2f9dd7fd6c962c20444cecd0cee403587f7811886c3b42949e9789692a3572b8ee70c34e823bd144fa7a00a530e]]

**Document description:** Proposed Order

**Original filename:** C:\fakepath\Order Shortening Time - Motion to Vacate Dismissal.pdf

**Electronic document Stamp:**

[STAMP bkecfStamp\_ID=1002741850 [Date=6/30/2022] [FileNumber=59890988-1] [06b8657f94a10ee8841f76fbd2164ac120f3cf3959af8a6e72a1131f0644c18defb64dd2eabec1b5dfe12729a5088e7d576fbc4107576491b0bcc8f5d6c992]]

**Document description:** Certificate of Service

**Original filename:** C:\fakepath\Cert of Service - Motion to Reinstate June 2022.pdf

**Electronic document Stamp:**

[STAMP bkecfStamp\_ID=1002741850 [Date=6/30/2022] [FileNumber=59890988-2] [7664ce3c7f7d0458c992b5e3432e34cde8aca158e4c4c80c4c7c651d5ecf3db975b85d3d6a01e200ec534744b23eba9ce12242d1b4cee6c45d522fb0b08d1155]]

**17-27250-JNP Notice will be electronically mailed to:**

Isabel C. Balboa

ecfmail@standingtrustee.com, summarymail@standingtrustee.com

Isabel C. Balboa on behalf of Trustee Isabel C. Balboa

ANTHONY LANDOLFI, ESQUIRE  
Professional Services Building  
295 Bridgeton Pike  
PO Box 111  
Mantua, NJ 08051  
(856)468-5900  
Attorney for Debtor

----- : UNITED STATES BANKRUPTCY COURT  
IN RE: : DISTRICT OF NEW JERSEY  
: :  
ROBERT M. MORACE, : Case No: 17-27250  
: :  
Debtor(s). : Hearing Date:  
: :  
: Judge: Jerrold N. Poslusny, Jr.  
----- :

### APPLICATION FOR ORDER SHORTENING TIME

The applicant, Anthony Landolfi, Esquire on behalf of Debtor, Robert M. Morace requests that the time period to/for the hearing on Debtor's Motion to Vacate Dismissal and Reinstate Case, as required by \_\_\_\_\_ be shortened pursuant to Fed. R. Bankr. P 9006(c)(1), for the reason(s) set forth below:

1. A shortened time hearing is requested because:

Debtor has only three (3) months to complete his Chapter 13 Plan. If Debtor is not reinstated as quickly as possible, Debtor's vehicle will be repossessed by the creditor, causing Debtor further financial difficulties.

2. State the hearing dates requested:

The week of July 5th.

3. Reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1).

The applicant requests entry of the proposed order shortening time.

Date: June 30, 2022

/s/ Anthony Landolfi  
Signature

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

Anthony Landolfi, Esquire  
Professional Services Building  
295 Bridgeton Pike  
PO Box 111  
Mantua, New Jersey 08051  
856-468-5900  
Attorney for Debtor

In Re:

ROBERT M. MORACE,  
Debtor.

Case No.: 17-27250

Chapter: 13

Judge: Jerrold N. Poslusny Jr

**ORDER SHORTENING TIME PERIOD FOR NOTICE,  
SETTING HEARING AND LIMITING NOTICE**

The relief set forth on the following pages, numbered two (2) and three (3), is hereby **ORDERED**.

6. A *Certification of Service* must be filed prior to the hearing date.

7. Any objections to the motion/application identified above:

- must be filed with the Court and served on all parties in interest by electronic or overnight mail \_\_\_\_\_ day(s) prior to the scheduled hearing; or
- may be presented orally at the hearing.

8.  Court appearances are required to prosecute the motion/application and any objections.

- Parties may request to appear by phone by contacting Chambers prior to the return date.

*rev.1/12/22*

**File a Motion:**

17-27250-JNP Robert M. Morace Debtor dismissed 05/05/2022

Type: bk

Chapter: 13 v

Office: 1 (Camden)

Assets: y

Debtor disposition: Dismissed  
for failure to make plan  
payments

Judge: JNP

Case Flag: DISMISSED DebtEd  
SUPDIS CONFIRMED

**FILED**

JEANNE A. NAUGHTON, CLERK

JUL - 5 2022

U.S. BANKRUPTCY COURT  
CAMDEN, N.J.  
BY DEPUTY

**Notice of Electronic Filing**

The following transaction was received from Anthony Landolfi entered on 6/30/2022 at 3:21 PM EDT and filed on 6/30/2022

**Case Name:** Robert M. Morace

**Case Number:** 17-27250-JNP

**Document Number:** 95

**Docket Text:**

Motion to Vacate Dismissal of Case Filed by Anthony Landolfi on behalf of Robert M. Morace.  
(Attachments: # (1) Certification # (2) Proposed Order # (3) Certificate of Service) (Landolfi, Anthony)

The following document(s) are associated with this transaction:

**Document description:** Main Document

**Original filename:** NOTICE OF MOTION TO REINSTATE - June 2022.pdf

**Electronic document Stamp:**

[STAMP bkecfStamp\_ID=1002741850 [Date=6/30/2022] [FileNumber=59890844-0] [02016a78e119964eebe90ff2cf0e6b24b8148317b267b1e11293335c914332bcb1fee4808bb6ac48e90d3d07563b504578977bf8ac215ffa7f8420b1e4f6739b]]

**Document description:** Certification

**Original filename:** C:\fakepath\Supporting Cert - Reinstatement - June 2022.pdf

**Electronic document Stamp:**

[STAMP bkecfStamp\_ID=1002741850 [Date=6/30/2022] [FileNumber=59890844-1] [1ca534e324424fd93941d489e79fae08b2233eaa496ec1ff6f9f66c05bff61278bceb968c531e8d82137e4be4aef2e4516cdcc1dc4800a4da14a2aa3d2d1e0e0]]

**Document description:** Proposed Order

**Original filename:** C:\fakepath\Proposed Order Vacate Dismissal - June 2022.pdf

**Electronic document Stamp:**

[STAMP bkecfStamp\_ID=1002741850 [Date=6/30/2022] [FileNumber=59890844-2] [8eb9577b79d9f46067c377d65ec4eb7e7bd9c198997ce0abe58c6a5f28495de9f2a35ebc3b917279e5f274824105e390728fe56181072cc84d438eb9cb770265]]

**Document description:** Certificate of Service

**Original filename:** C:\fakepath\Cert of Service - Motion to Reinstate June 2022.pdf

**Electronic document Stamp:**

[STAMP bkecfStamp\_ID=1002741850 [Date=6/30/2022] [FileNumber=59890844-3] [5cf38c15999f4fe4ce8c6437fc585b238681e7f6b4678e63c30f15328f7801fac9365b59f938d08078caca9bdb03f49e1c9b478b90715674898a34c23f6fb815]]

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

Anthony Landolfi, Esquire  
Professional Services Building  
295 Bridgeton Pike  
PO Box 111  
Mantua, New Jersey 08051  
856-468-5900  
Attorney for Debtor

In Re:  
Robert M. Morace,  
Debtor.

Case No.: 17-27250  
Chapter: 13  
Judge: Jerrold N. Poslusny, Jr.

**ORDER ON MOTION TO VACATE DISMISSAL OF CASE**

The relief set forth on the following page is hereby **ORDERED**.

The debtor having filed a motion to vacate dismissal of case; and the court having considered any objections filed; and for good cause shown; it is

ORDERED that the motion is granted and the order dismissing case is vacated effective on the date of this order. No actions taken during the period this case was dismissed were subject to the automatic stay or other provisions of the Bankruptcy Code;

IT IS FURTHER ORDERED that any deadline unexpired at the time of dismissal is nullified and reset as follows. Creditors and/or parties in interest have:

1. until the original deadline fixed by the court to file a complaint to object to the debtor's discharge or dischargeability of certain debts, or 60 days from the date of this Order, whichever is later;
2. until the original deadline fixed by the court to file a proof of claim or required supplement, or 60 days from the date of this Order, whichever is later; and
3. until the original deadline fixed by the court to object to exemptions, or 30 days from the date of this Order, whichever is later.

IT IS FURTHER ORDERED that if the meeting of creditors has not been concluded, the debtor must contact the case trustee to schedule a new date for the meeting, and must provide 21 days' notice under Bankruptcy Rule 2002(a)(1) of the new date to all creditors and parties in interest.

IT IS FURTHER ORDERED that if this is a chapter 13 case, and the debtor's plan has not been confirmed, the confirmation hearing is rescheduled to \_\_\_\_\_ at \_\_\_\_\_.

ORDERED that the motion to vacate order dismissing case is denied.

ORDERED (Other): \_\_\_\_\_

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IT IS FURTHER ORDERED that whether the motion is granted or denied, the debtor must, within 3 days of the date of this Order, serve all creditors and parties in interest with a copy of this Order and immediately thereafter file Local Form *Certification of Service*.

ANTHONY LANDOLFI, ESQUIRE, P.C.  
Professional Services Building  
295 Bridgeton Pike  
PO Box 111  
Mantua, NJ 08051  
(856)468-5900  
Attorney for Debtor

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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY, CAMDEN DIVISION

In Re: : CASE NO: 17-27250 (JNP)  
ROBERT M. MORACE, :  
: CHAPTER 13  
Debtor. :  
:

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**NOTICE OF MOTION TO VACATE DISMISSAL  
AND REINSTATE CHAPTER 13 PLAN AND CHAPTER 13 PETITION**

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**PLEASE TAKE NOTICE** that on the \_\_\_\_\_ day of July 2022, or as soon thereafter as counsel may be heard, the undersigned, as Attorney for Debtor, will move before the United States Bankruptcy Court, the Honorable Jerrold N. Poslusny, Jr., presiding at the Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4<sup>th</sup> Floor, Courtroom 4C, Camden, New Jersey, for an Order Vacating Dismissal and Reinstating Chapter 13 Petition.

Dated: June 30, 2022

Respectfully submitted,

BY: /s/ Anthony Landolfi  
ANTHONY LANDOLFI, ESQUIRE

ANTHONY LANDOLFI, ESQUIRE, P.C.  
Professional Services Building  
295 Bridgeton Pike  
PO Box 111  
Mantua, NJ 08051  
(856)468-5900  
Attorney for Debtor

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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY, CAMDEN DIVISION

In Re: : CASE NO: 17-27250 (JNP)  
ROBERT M. MORACE, :  
Debtor. : CHAPTER 13

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**CERTIFICATION IN SUPPORT OF MOTION TO VACATE DISMISSAL  
AND REINSTATE CHAPTER 13 PETITION AND PLAN**

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I, Robert M. Morace, debtor in the above-captioned matter, hereby certify as follows:

1. I filed for protection under 11 U.S.C. Chapter 13 on August 25, 2017.
2. My bankruptcy case was dismissed on May 6, 2022 due to the following: a) failure to make all trustee payments.
3. I failed to make Trustee payments because I was out of work for a period of time after having surgery for my appendix, as well as having to take additional time off from work for my youngest daughter, who was going through a personal hardship.
4. I have only three months left to complete my Chapter 13 Plan, and my intention is to have my Petition and Plan Reinstated and to make three payments of \$1,419.00, with the first being on July 15, 2022, then August 15, 2022 and, finally, September 15, 2022, which allows me to cure my arrears and complete my plan in the required time period.
5. This Certification is made in Support of Motion to Vacate Dismissal, Reinstate Chapter 13 Petition and Plan.

I hereby certify that all of the above statements are true and correct to the best of my information, knowledge and belief. I understand that if any of the foregoing statements are found to be wilfully false, I am subject to punishment.

Dated: June 30, 2022

/s/ Robert M. Morace

Robert M. Morace, Debtor

*Anthony Landoff, Esq., P.C.*  
PROFESSIONAL SERVICES BLDG.  
295 BRIDGETON PIKE  
P.O. BOX 111  
MANTUA, NEW JERSEY 08051



U.S. Bankruptcy Court  
United States Bankruptcy Court  
P.O. Box 2067  
Camden, New Jersey 08101

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